

FILED

SEP 03 2013

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Phil Lombardi, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No. **13 CR 168 JHP**

Plaintiff,

INDICTMENT

[18 U.S.C. § 1001(a)(3): False Statement]

v.

SHELLY ROANHORSE,

Defendant.

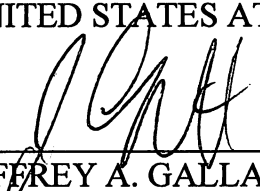
THE GRAND JURY CHARGES:

On or about March 30, 2012, in the Northern District of Oklahoma and elsewhere, in a matter within the jurisdiction of the United States Department of Labor, a department of the United States, the defendant, **SHELLY ROANHORSE**, did willfully and knowingly make and use, and caused to be made and used, a false writing and document, that is: a Form LM-3 Labor Organization Annual Report on behalf of Government Employees A.F.G.E. AFL-CIO Local 3601, knowing the same to contain materially false, fictitious, and fraudulent statements, including falsely and fraudulently stating the amount of disbursements she received from Local 3601.

All in violation of Title 18, United States Code, Section 1001(a)(3).

**DANNY C. WILLIAMS, SR.
UNITED STATES ATTORNEY**

A TRUE BILL


JEFFREY A. GALLANT
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson